STATEMENT OF BASIS

Title V Air Operation Permit Revision
Permit No. 0570021-014-AV

APPLICANT

The applicant for this project is International Ship Repair & Marine Services, Inc. The applicant's responsible official and mailing address are: George Lorton, President, International Ship Repair and Marine Services, Inc., 1616 Penny Street, Tampa, FL 33605.

FACILITY DESCRIPTION

The applicant operates the existing International Ship Repair and Marine Services, which is located in Hillsborough County at 1616 Penny Street, Tampa, Florida.

This permit is for the operation of a ship repair and maintenance facility. International Ship Repair & Marine Services, Inc. (ISR) performs operations that include the blasting and coating of marine vessels. The abrasive material used for blasting is coal slag which is stored on-site in storage silos that are pneumatically loaded. The blasting equipment includes blasting pots and a maximum of 16 blasting nozzles. Both external and internal blasting of ships occurs at the facility. Compressed air for propelling the abrasive grit is provided by up to eight diesel compressors. Steel shot is also an approved blasting media.

ISR's operations include the main yard at 1616 Penny Street in Tampa, Metro Port (Berth 263, 264 and 265) and Berths 200 and 206 at Hooker's Point. All of the maintenance locations are considered part of the same Title V source and, as a result, this permit reflects the emissions and usage limits from all of the permitted locations combined.

Also, there three spent grit storage areas at the facility. ISR stores the spent grit at the main yard, Berth 200, and the Metro Port as well. After blasting, the spent grit is transferred to the storage area where it gets loaded into dump trucks for recycling via front end loaders. The spent grit usually has high moisture content and contains paint chips and trash.

After blasting, the surfaces are sprayed with a series of marine coatings which may contain one or more volatile organic compounds (VOCs) and/or hazardous air pollutants (HAPs). VOC and HAP emissions are controlled through various coating content restrictions and limits on usage in any 12-month period.

Particulate Matter (PM) emissions from storage silo loading are limited by passing the displaced air through fabric filters (or baghouses). Compressor emissions are controlled by the use of diesel fuel only and a limitation on the amount of diesel fuel used in any 12 month period. PM emissions from blasting are minimized with a limit on the amount of abrasive grit used in any 12 month period, the use of tarps/barriers that surround the blasting area, and other reasonable precautions. When blasting an internal section of a ship, the displaced air is passed through a filter device or a tarp enclosure that covers the exhaust points from the internal blasting prior to exhausting to the atmosphere.

Also included in this permit is a list of insignificant emissions units and/or activities, which includes two parts washers (degreasers) for decreasing nuts and bolts and small parts, as well as two portable boilers.

PROJECT DESCRIPTION

The purpose of this permitting project is to incorporate the air construction (AC) Permit No. 0570021-013-AC into the current Title V Operating Permit No. 0570021-012-AV.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received April 25, 2013
Additional Information Request: N/A
DRAFT/PROPOSED Title V Air Operation Permit Revision issued July 8, 2013
Notice of Intent to Issue Air Permit issued July 8, 2013
Public Notice Published August 14, 2013
FINAL Title V Air Operation Permit Revision issued October 9, 2013

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is a major source of hazardous air pollutants (HAP) emissions.
Title V: The facility is a Title V major source of particulate matter (PM) and volatile organic compound (VOC) emissions in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).
PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.
NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.
NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63, specifically 40 CFR 63 Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating).
CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

PROJECT REVIEW

The AC Permit was for the modification of the blasting booth in the main yard. The current baghouse (4,300 acfm, Donaldson Torit, Model Downflo Oval) was replaced with a 30,000 acfm cartridge dust collector (Model 64-HF-43SE2), manufactured by Industrial Vacuum Equipment Corporation.

ISR has two blasting booths; one is located in the main yard and the other is located at Berth 200. Both blasting booths are currently permitted under EU 004 - Interior Blasting and Miscellaneous Metal Blasting. The booth at the main yard measures approximately 27.5’ W x 12.5’ H x 50’ L and is closed on all sides except the front side. The front side has a curtain/tarp that is capable of being open and closed as needed to move metal parts in and out of the booth. The curtain/tarp is required to remain closed during any blasting or coating activities to control airborne emissions. Metal parts are blasted within the booth using electric compressors and blasting nozzles. PM emissions from the blasting operation are controlled by the building enclosure and vented to the baghouse on the back side of the booth. During coating operations, spray nozzles are used to apply coatings to the metal parts. During this operation, the baghouse is not required to be operational, but the curtain/tarp must remain closed to prevent overspray.

The current Title V Permit No. 0570021-012-AV issued on December 21, 2010 included a Compliance Plan, Appendix CP-1, which required IRS to make improvements to the blasting booths in the main yard and at Berth 200 in order to demonstrate compliance with the 5% opacity standard pursuant to Rule 62-296.712(2), F.A.C. Permit No. 0570021-013-AC, which is being incorporated into this Title V permit only included the modifications on the blasting booth located in the main yard. During the AC permit process, ISR stated that due to the slow economic conditions at that time, modifications to the blasting booth located at Berth 200 would be put on hold and will be evaluated in the future. During this Title V revision application process, ISR staff stated that the blasting booth at Berth 200 has not been operational, but ISR requested to maintain this booth in the permit in the event that the booth is brought back on-line. Therefore, this Title V revision will include a revised Compliance Plan, Appendix CP-2,

which requires that an evaluation be made and possible corrective measures be taken prior to the operation of the blasting booth at Berth 200, in order to comply with the 5% opacity limit.
ISR is subject to PM-RACT because the maximum hourly facility-wide PM PTE is greater than 5 lbs/hr and 15 TPY. The abrasive blasting of ship exteriors is **not** subject to PM-RACT, since it is not reasonable to enclose. The abrasive blasting of miscellaneous metal parts in the blasting containment area prior to attachment to the ship is subject to the 0.03 gr/dscf particulate matter limit and 5% opacity limit pursuant to Rule 62-296.712(2), F.A.C. The silo loading and blasting booth operations are subject to the 5% opacity standard of Chapter 1-3.52, Paragraph 2, Rules of the EPC. The diesel compressor is subject to the 20% opacity standard of Rule 62-296.320, F.A.C. Furthermore, the facility is subject to VOC-RACT Rule 62-296.513, F.A.C., for the surface coating operation of ship interiors and miscellaneous parts, excluding the coating of the exterior of an assembled ship.

CONCLUSION

This project is to revise the Title V air operation permit No. 0570021-012-AV, which was issued on December 21, 2010. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.